

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

DENNIS WISDOM,)	
)	
Plaintiff,)	
)	
v.)	
)	
JACOBSON WAREHOUSE CO., INC.)	
d/b/a XPO LOGISTICS SUPPLY CHAIN,)	
)	No. 3:18-cv-245-JPG-DGW
Defendant/Third-party Plaintiff,)	
)	
v.)	
)	
SCHNUCK MARKET'S INC.,)	
)	
Third-party Defendant.)	

**THIRD PARTY DEFENDANT SCHNUCK MARKETS, INC.'S RESPONSES TO
PLAINTIFF'S REQUEST TO ADMIT STATEMENT OF FACT AND GENUINENESS
OF DOCUMENTS**

COMES NOW the Third Party Defendant SCHNUCK MARKETS, INC., and in its Responses to Plaintiff's Request to Admit Statement of Fact and Genuineness of Documents, states as follows:

1. That attached as Exhibit A is a genuine copy of medical bills issued by BarnesCare, consisting of six (6) pages, for care and treatment rendered to Dennis R. Wisdom on December 23, 2015; December 29, 2015; January 5, 2016; January 19, 2016; and January 26, 2016.

ANSWER: Admitted.

2. Exhibit A, being the charges of BarnesCare in the amount of \$1,617.00, are reasonable and necessary charges for medical care and treatment rendered to Dennis R. Wisdom.

ANSWER: Admitted.

3. That the charges itemized in Exhibit A were incurred as a proximate result of the injurious occurrence on December 22, 2015, and described in plaintiff's complaint.

ANSWER: Admitted.

4. That attached as Exhibit B is a genuine copy of medical bills issued by David M. Brown, M.D./The Orthopedic Center of St. Louis, LLC, consisting of two (2) pages, for care and treatment rendered to Dennis R. Wisdom on January 25, 2016; March 17, 2016; and April 4, 2016.

ANSWER: Admitted.

5. Exhibit B, being the charges of David M. Brown, M.D./The Orthopedic Center of St. Louis, LLC, in the amount of \$5,747.00, are reasonable and necessary charges for medical care and treatment rendered to Dennis R. Wisdom.

ANSWER: Admitted.

6. That the charges itemized in Exhibit B were incurred as a proximate result of the injurious occurrence on December 22, 2015, and described in plaintiff's complaint.

ANSWER: Admitted.

7. That attached as Exhibit C is a genuine copy of medical bills issued by Dr. Bernard Randolph, Jr./Mercy Clinic, consisting of two (2) pages, for care and treatment rendered to Dennis R. Wisdom on February 16, 2016; March 8, 2016; and March 30, 2016.

ANSWER: Admitted.

8. Exhibit C, being the charges of Dr. Bernard Randolph, Jr./Mercy Clinic, in the amount of \$460.00, are reasonable and necessary charges for medical care and treatment rendered to Dennis R. Wisdom.

ANSWER: Admitted.

9. That the charges itemized in Exhibit C were incurred as a proximate result of the injurious occurrence on December 22, 2015, and described in plaintiff's complaint.

ANSWER: Admitted.

10. That attached as Exhibit D is a genuine copy of medical bills issued by the Orthopedic Ambulatory Surgery Center of Chesterfield, consisting of two (2) pages, for care and treatment rendered to Dennis R. Wisdom on March 17, 2016.

ANSWER: Admitted.

11. Exhibit D, being the charges of the Orthopedic Ambulatory Surgery Center of Chesterfield in the amount of \$8,669.33, are reasonable and necessary charges for medical care and treatment rendered to Dennis R. Wisdom.

ANSWER: Admitted.

12. That the charges itemized in Exhibit D were incurred as a proximate result of the injurious occurrence on December 22, 2015, and described in plaintiff's complaint.

ANSWER: Admitted.

13. That attached as Exhibit E is a genuine copy of medical bills issued by MRI Partners of Chesterfield, consisting of two (2) pages, for care and treatment rendered to Dennis R. Wisdom on May 10, 2016 and August 4, 2016.

ANSWER: Admitted.

14. Exhibit E, being the charges of MRI Partners of Chesterfield in the amount of \$4,450.00, are reasonable and necessary charges for medical care and treatment rendered to Dennis R. Wisdom.

ANSWER: Admitted.

15. That the charges itemized in Exhibit E were incurred as a proximate result of the injurious occurrence on December 22, 2015, and described in plaintiff's complaint.

ANSWER: Admitted.

16. That attached as Exhibit F is a genuine copy of medical bills issued by Kaylea Boutwell, MD, consisting of two (2) pages, for care and treatment rendered to Dennis R. Wisdom on July 14, 2016 and July 25, 2016.

ANSWER: Admitted.

17. Exhibit F, being the charges of Kaylea Boutwell, MD, in the amount of \$2,518.00, are reasonable and necessary charges for medical care and treatment rendered to Dennis R. Wisdom.

ANSWER: Admitted.

18. That the charges itemized in Exhibit F were incurred as a proximate result of the injurious occurrence on December 22, 2015, and described in plaintiff's complaint.

ANSWER: Admitted.

19. That attached as Exhibit G is a genuine copy of medical bills issued by Dr. Matthew F. Gornet/The Orthopedic Center of St. Louis, LLC, consisting of two (2) pages, for care and treatment rendered to Dennis R. Wisdom on May 10, 2016; August 4, 2016; October 6, 2016; May 18, 2017; and November 20, 2017.

ANSWER: Admitted.

20. Exhibit G, being the charges of Dr. Matthew F. Gornet/The Orthopedic Center of St. Louis, LLC, in the amount of \$2,218.60, are reasonable and necessary charges for medical care and treatment rendered to Dennis R. Wisdom.

ANSWER: Admitted.

21. That the charges itemized in Exhibit G were incurred as a proximate result of the injurious occurrence on December 22, 2015, and described in plaintiff's complaint.

ANSWER: Admitted.

SCHNUCK MARKETS, INC., Third-Party
Defendant

BY: Barry S. Noeltner
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this **10TH** day of **January, 2019**, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to the following:

Lanny Darr, Esq. – Darr@darrfirm.com

DARR FIRM

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BOYLE BRASHER LLC

Attorneys for Defendant/Third Party Plaintiff

/s/ Barry Noeltner
